Remarks

Claims 1, 4-8, 11-13, 15-19 and 21 are pending. By this Amendment, claims 1, 8, 11-12, 18 and 21 have been amended; and claims 3, 10, 14 and 20 have been cancelled.

Claims 1, 3-8 and 10-11 were rejected under 35 USC 103(a) as being unpatentable over Wu et al. (US 6,614,936), hereinafter "Wu," in view of Mishima et al. (US 5,488,418), hereinafter "Mishima," and further in view of Strongin et al. (US 5,872,866), hereinafter "Strongin"; claims 12-21 were rejected under 35 USC 103(a) as being unpatentable over De Bonet et al. (6,510,177), hereinafter "De Bonet," in view of Strongin. Applicants submit that the claimed subject matter is allowable for the reasons stated below.

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. In this case, the Office fails to establish a *prima facie* case of obviousness.

With regard to claims 1, 8, 11-12, 18 and 21, Applicants submit that the cited prior art fails to teach or suggest each and every claimed feature. For instance, the claimed invention includes, *inter alia*, "selecting only one of the DCT modules for performing DCT computation based on factors including an available level of computing resources[,]" as recited in claim 1 and claimed similarly in claims 8, 11-12, 18 and 21.

Applicants submit that none of the cited prior art or their combination discloses or suggests this feature.

Specifically, in Strongin, the selection of an optimal IDCT procedure is "[b]ased on the number of non-zero coefficients" (col. 13, line 33; *see also* col. 13, lines 34-36), not based on "factors including an available level of computing resources" as included in the claimed invention.

In rejecting claims 3-7 and 10, the Office asserts that Mishima discloses the above-identified features of the claimed invention. (*See* Office Action at pages 5-6, *citing* Mishima at col. 24, lines 23-33.) Applicants carefully reviewed the cited portion of Mishima, but do not find any support for the Office's assertion, because Mishima does not disclose anything that the blocking circuits 68, 69 and 70 are selected based on. (*See* Mishima at col. 24, lines 23-33.) In addition, the blocking circuits (68, 69 and 70) of Mishima are not DCT modules for performing DCT computation. Rather, in Mishima, "77 are DCT circuits which perform the DCT[.]" (Col. 24, lines 22-23). Moreover, Mishima discloses switching outputs of the DCT circuits, although the switching is performed after all the DCT circuits have already performed the DCT, i.e., switching outputs. That is, Mishima does not include "selecting only one of the DCT modules for performing DCT," as the claimed invention does. (Claim 1 of the current invention). (Emphasis added). Wu does not overcome, *inter alia*, this deficiency of Mishima and Strongin, as the Office admits. (*See* Office Action at page 5.)

In view of the foregoing, the suggested combination of the cited prior art does not disclose or suggest each and every claimed feature and the Office fails to establish a

prima facie case of obviousness. Accordingly, Applicants respectfully request withdrawal of the rejection.

The dependent claims are believed allowable for the same reasons stated above, as well as for their own additional features.

If the Examiner believes that anything further is necessary to place the application in condition for allowance, the Examiner is requested to contact Applicants' undersigned attorney at the telephone number listed below.

Respectfully submitted,

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